

# **Exhibit 2**

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April 15, 2021

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***By Email***

Jared A. Smith  
Fish & Richardson P.C.  
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Re: *Finjan, Inc. v. Palo Alto Networks, Inc.*, Case No.14-cv-04908-PJH (N.D. Cal.)

Counsel:

We write in response to your March 22, 2021 letter. We disagree that PAN's production of technical and financial documents regarding the accused instrumentalities is deficient. Prior to the stay, Finjan had repeatedly refused to clarify the infringement allegations in its Complaint to allow PAN to meaningfully assess relevant documents for production. Despite Finjan's refusal to do so and the fact that discovery had largely just begun when the case was stayed, PAN was diligent in producing source code and over 100,000 pages of documents prior to the stay, even before the parties had entered into a protective order and ESI order.

Since the stay was lifted, Finjan represented during the Case Management Conference that it would substantially narrow the case, and the parties only recently filed a stipulation to dismiss three patents-in-suit on March 26, 2021, which the Court entered on March 31, 2021. Moreover, PAN only just received Finjan's infringement contentions on April 1, 2021, which identify the claims and accused products that are at issue in this case. While these contentions are deficient in many respects (which we will address in separate correspondence), PAN is more than willing to supplement its prior technical and financial productions within a reasonable amount of time in light of these newly-served infringement contentions.

On the three particular issues raised in your letter, PAN responds as follows:

1. Regarding your allegation that PAN did not produce visible versions of Visio files for the accused instrumentalities, please identify specific Bates numbers of the

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documents for which you are having issues. We are not having issues viewing produced versions of Visio files we have located in PAN's productions.

2. Regarding your allegation that PAN's produced HTML files of its prior websites are missing images, please identify specific Bates numbers of such documents and provide an explanation as to why the purportedly missing content is essential to Finjan. Clearly, producing every piece of content ever posted on PAN's website would be a large undertaking disproportionate to the needs of this case.
3. With respect to your assertion that PAN did not produce any instructional videos, as your letter acknowledges, such instructional videos are publicly available on PAN's current YouTube page. The burden and expense of requiring PAN to produce these publicly available videos outweigh any benefit. Thus, PAN will not do so.

Should you have any questions, please feel free to contact me to meet and confer.

Sincerely,

*/s/ Rose S. Lee*

Rose S. Lee